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December 9, 2025

*Via ECF*

Hon. Vera M. Scanlon, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11021

**Re: Singh v. Topline NYC Contracting Inc., et al.**  
**1:25-cv-00776-NCM-VMS**

Dear Judge Scanlon:

On November 13, 2025, defendants filed their Second Amended Answer and Counterclaim. (Doc. 40)

To date, no reply was filed. The deadline for filing a reply was December 4, 2025, i.e., twenty-one days after service. Rule 12(a)(1)(B).

My clients do not object to plaintiff filing a reply, they do object to permitting him to prepare an untimely motion to dismiss. Rule 12(b).

Thank you for your attention to this.

Very truly yours,

*Lila Ayers*

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cc: Emanuel Kataev, Esq.